

# **EXHIBIT C**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**MONICA ABBOUD**, individually and  
on behalf of all others similarly situated,

*Plaintiff,*

v.

**AGENTRA, LLC,**

*Defendant.*

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**Case No. 3:19-cv-00120-K**

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**DEFENDANT’S RESPONSES TO PLAINTIFF’S REQUESTS FOR ADMISSION**

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TO: Monica Abboud, by and through her attorney of record, Taylor T. Smith, Steven L. Woodrow, Robert B. Kleinman, and Brooke Frances Cohen, Woodrow & Peluso, LLC, 3900 East Mexico Ave., Suite 300, Denver, Colorado 80210.

Defendant Agentra, LLC (“Defendant”), serves its Responses to Plaintiff’s Requests for Admission.

**REQUESTS FOR ADMISSION**

**REQUEST TO ADMIT NO. 1**

Admit that You do not possess any prior express written consent to place telemarketing calls or text message calls to Plaintiff.

**RESPONSE:** Defendant admits that prior to Plaintiff Monica Abboud’s subscription to certain insurance policies marketed by independent contractors of Defendant, Defendant did not possess any prior express written consent to place telemarketing calls or text message calls to Plaintiff Monica Abboud. Defendant otherwise denies this request.

**REQUEST TO ADMIT NO. 2**

Admit that You or a third party acting on Your behalf or for Your benefit utilized an

artificial and/or prerecorded voice to place calls to Plaintiff.

**RESPONSE:** Defendant denies this request.

**REQUEST TO ADMIT NO. 3**

Admit that You or a third party acting on Your behalf or for Your benefit sent the text message calls to Plaintiff that have been produced and bates labeled ABBOUD000001 – ABBOUD000003.

**RESPONSE:** Defendant denies this request.

**REQUEST TO ADMIT NO. 4**

Admit that You or a third party acting on Your behalf or for Your benefit caused over 1,000 calls to be placed to the cellular telephones of Persons where the Persons provided prior express consent in the same manner that You claim any consent was obtained from Plaintiff.

**RESPONSE:** Defendant denies this request.

**REQUEST TO ADMIT NO. 5**

Admit that You or a third party acting on Your behalf or for Your benefit called over 1,000 Persons where the Persons provided prior express consent in the same manner that You claim any consent was obtained from Plaintiff.

**RESPONSE:** Defendant denies this request.

**REQUEST TO ADMIT NO. 6**

Admit that You or a third party acting on Your behalf or for Your benefit caused over 1,000 text message calls to be placed to the cellular telephones of Persons where the Persons provided prior express consent in the same manner that You claim any consent was obtained from Plaintiff.

**RESPONSE:** Defendant denies this request.

**REQUEST TO ADMIT NO. 7**

Admit that You or a third party acting on Your behalf or for Your benefit sent text message calls to over 1,000 Persons where the Persons provided prior express consent in the same manner that You claim any consent was obtained from Plaintiff.

**RESPONSE:** Defendant denies this request.

**REQUEST TO ADMIT NO. 8**

Admit that the purpose of the telephone calls to Plaintiff was to encourage the purchase of products, goods, or services.

**RESPONSE:** Defendant denies this request.

**REQUEST TO ADMIT NO. 9**

Admit that the purpose of the text message calls You or any third party acting on Your behalf or for Your benefit sent to Plaintiff was to encourage the purchase of products, goods, or services.

**RESPONSE:** Defendant denies this request.

**REQUEST TO ADMIT NO. 10**

Admit that You are capable of identifying all Persons to whom You or any third party acting on Your behalf or for Your benefit placed calls and/or sent text message calls to during the relevant time period where consent to place the call or text was obtained in the same manner as consent was supposedly obtained to call and text Plaintiff.

**RESPONSE:** Defendant denies this request.

**REQUEST TO ADMIT NO. 11**

Admit that the calls and text message calls that Plaintiff received were made on Your behalf or for Your benefit.

**RESPONSE:** Defendant denies this request.

Dated: July 1, 2019

Respectfully submitted,

**PLATT CHEEMA RICHMOND PLLC**

By:   
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**COUNSEL FOR DEFENDANT**

**CERTIFICATE OF SERVICE**

The undersigned counsel for Defendant hereby certifies that this document was served on counsel of record on July 1, 2019 by electronic filing.

  
WILLIAM S. RICHMOND